

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION**

IN RE:	§	CHAPTER 11
	§	
BOWIE REAL ESTATE HOLDINGS, LP	§	CASE NO. 20-70115-hdh11
	§	
DEBTOR	§	

**MONTAGUE COUNTY AND MONTAGUE COUNTY APPRAISAL DISTRICTS’  
JOINDER TO CROSSFIRST BANK’S MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY AND, IN THE ALTERNATIVE, JOINDER TO CROSSFIRST  
BANK’S MOTION TO DISMISS**

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TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Montague County and the Montague County Appraisal District (herein “Taxing Authorities”), who hereby join CrossFirst Bank’s Motion for Relief from the Automatic Stay [Docket 27] and, in the alternative, CrossFirst Bank’s Motion to Dismiss [Docket 26], and would respectfully show the Court the following:

1. The Taxing Authorities are political subdivisions of the State of Texas located in Montague County, Texas. The Taxing Authorities are authorized and required by the Texas Constitution and laws to levy and collect taxes on taxable personal and real property within their boundaries in order to operate and discharge their public purposes.
2. The Taxing Authorities hold secured pre-petition tax claims on assets owned by the Debtor.<sup>1</sup> These claims are secured by tax liens on the real and tangible personal property of the Debtor within their taxing boundaries (the “Tax Liens”).

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<sup>1</sup> See Claim Nos. 1, 2, 3, and 4 filed on behalf of the Taxing Authorities for a combined amount of \$155,317.38.

3. The Tax Liens are superior to any other secured claim in this case as provided by Article VIII, Section 15 of the Texas Constitution, and Sections 32.01 and Section 32.05(b) of the Texas Property Tax Code.

4. The Taxing Authorities join in the Motion for Relief from the Automatic Stay filed by CrossFirst Bank, and adopt the arguments and authorities advanced in said Motion. Alternatively, the Taxing Authorities join in the Motion to Dismiss filed by CrossFirst Bank, and adopt the arguments and authorities advanced in said Motion.

WHEREFORE, the Taxing Authorities respectfully request that the Court grant CrossFirst Bank's Motion for Relief from the Automatic Stay or, in the alternative, grant CrossFirst Bank's Motion to Dismiss, and grant such other and further relief as the Court may deem just and proper.

Dated this 24<sup>th</sup> day of July, 2020.

Respectfully submitted,

**PERDUE, BRANDON, FIELDER,  
COLLINS & MOTT, L.L.P.**

By: 

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served upon the following parties in accordance with Rules 21 and 21a of the Texas Rules of Civil Procedure.

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